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Briefing Report to the Chairman, Subcommittee on Environment, Energy, and Natural Resources, Committee on Government Operations, House of Representatives

December 1985

HAZARDOUS WASTE

Status of Cleanup at the Former Hamilton Air Force Base, California

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National Security and
International Affairs Division

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December 6, 1985

The Honorable Mike Synar
Chairman, Subcommittee on Environment,
Energy, and Natural Resources
Committee on Government Operations
House of Representatives

Dear Mr. Chairman:

On June 13, 1985, you asked us to review the Department of Defense (DOD) program for identifying and cleaning up hazardous waste on its formerly owned properties. Because of the interest of Representative Barbara Boxer of California, it was agreed that, as a part of that review, we would provide you a status report on the disposal and cleanup of the former Hamilton Air Force Base, Novato, California. On September 26, 1985, we briefed your staff on the preliminary results of our work, and have since updated the information presented in that briefing.

In summary, we found that the hazardous waste cleanup at Hamilton has been expedited since mid-April 1985 when the Army and Air Force roles and responsibilities for the cleanup were defined. However, we identified several instances when DOD did not facilitate the identification of hazardous waste contamination. We also observed that the General Services Administration (GSA) did not follow two of its regulations for the disposal of real property. Our observations are discussed in more detail on pages 7 and 8 of the enclosed briefing document.

In conducting our review, we interviewed officials and examined records from GSA, DOD, the Environmental Protection Agency, and the California Department of Health Services. We also reviewed DOD and GSA regulations on the decontamination and disposal of real property. However, we did not independently evaluate the quality of the cleanup efforts. We made our review between July and November 1985 in accordance with generally accepted government auditing standards.

The views of directly responsible DOD and GSA officials were sought during the course of our work and are incorporated in the enclosure where appropriate. In accordance with your wishes, we did not request DOD or GSA to review and comment officially on the enclosure.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of issuance. At that time, we will send copies to interested parties and make copies available to others upon request.

Sincerely yours,

Harry R. Finley

Harry R. Finley
Senior Associate Director

HAZARDOUS WASTE: STATUS OF CLEANUP AT THE FORMER HAMILTON AIR FORCE BASE, CALIFORNIA

HISTORY

Pre-1931	The land is used primarily for agricultural purposes.
1931	Construction of the base begins. Its mission is air defense.
1974	Air Force excesses most of the approximately 2,100 acres of Hamilton Air Force Base because it is no longer needed for current or future requirements. The Navy assumes most of the family housing and the Army acquires 9.45 acres for reserve activities. (A map of Hamilton appears on page 9.) A Report of Excess is filed with the General Services Administration (GSA) for disposal of the excess land. GSA begins to offer the property to other federal agencies and local governments.
1978-83	The Army acquires use of additional parcels of land.
1979	The state of California files suit in an effort to acquire the land.
1981	According to a Navy official, the Navy assumes responsibility for all utilities at Hamilton, including inspection of transformers containing polychlorinated biphenyls (PCBs), under an interservice support agreement.
1983	The Army acquires about 750 acres, including the airstrip, for its use. It assumes care and custody of all the excess lands and thereby becomes the holding agency. The Navy is still responsible for all utilities.
1984	
March	The Army identifies evidence of toxic and hazardous waste at Hamilton. In renovating a building on its newly acquired property, the

	Army identifies a transformer leaking PCBs. Although the Navy is responsible for inspecting electrical transformers under the support agreement, the Army removes the transformer.
July	An Army environmental engineer told us that, in July 1984, he identified a transformer leaking PCBs on the excess property and visited the site with a representative from GSA. The building containing the transformer was placed off limits. The transformer was not removed until the Army began its surface cleanup in May 1985.
August	The Army identifies a petroleum leak on Army land called the "tank farm" (a parcel of land completely surrounded by the excess land).
	The tank is drained and the tank farm is closed.
October	The state settles its suit and receives parcels of land.
	GSA proceeds with efforts to dispose of the property and establishes a March 6, 1985, sale date.
November	The Army installation coordinator identifies containers of both known and unknown hazardous substances. He requests assistance from the environmental engineer of the Army's Directorate of Engineering and Housing in identifying the unknown substances and in disposing of all substances. The official from the Directorate responsible for scheduling the work told us that the Army did not have time to provide the assistance.
1985	
January	GSA issues an Invitation for Bid on the property. It contains no reference to contamination. The real estate director told us that, to his knowledge, the property had no major contamination. Therefore, the realty specialists begin showing the property saying there is no major contamination.

	GSA makes a written request to the Army for a statement that the property is in compliance with PCB regulations. The Army states that it cannot comply because it has limited knowledge of the newly acquired property.
February	The Army begins a surface survey of the land.
	Concurrently, a representative from the California Department of Health Services (DOHS), pursuant to inquiries from Representative Barbara Boxer, meets with the Army regarding allegations of toxic waste at Hamilton. The DOHS official agrees that the Army's survey will cover its concerns.
	GSA agrees that the Army can conduct a cursory contamination survey with the intent of determining any potential contamination problems, including PCB transformer leaks.
	The Army finishes its survey. The report finds identified and unidentified toxic and hazardous chemicals, petroleum products, and leaking PCB transformers. The report states that, "Based on the presence of ... materials found in the more obvious locations throughout the sale area upon which this survey focused, it is not unreasonable to suspect that other areas, less accessible or hidden, may contain hazardous or toxic materials, and that contamination of the underlying soil, pavement, or floors may have occurred, either by leakage, spillage, or deliberate landfilling."
	According to the Army, the survey cannot be considered comprehensive. Due to time constraints, it is limited to the buildings and other improvements, and their surrounding areas, on the excess land. Some buildings were inaccessible.
March	The Army survey results are provided to GSA and DOHS.
	Army officials told us that, although they orally advised GSA against selling the property at this time, they made no written request to delay the sale.

GSA does not advise prospective buyers of the potential hazards, as required in its regulations. The GSA real estate director told us that GSA did not do this because the Army survey identified surface contaminants, which he believed could be removed, and did not contain specific information on potential problems.

March 6 — The property is auctioned at a price of $45 million. (As of November 21, 1985, the transaction has not been consummated.)

April — GSA gives the successful bidder the Army's survey results. The successful bidder writes to GSA stating his expectation that toxic wastes will be removed before the transaction is consummated.

As a result of the Army's survey, DOHS issues a Notice of Violation of state hazardous waste regulations against the Army.

STATUS OF CLEANUP

1985

April — The Secretary of Defense directs the Air Force to pay for the toxic and hazardous waste cleanup at Hamilton and the Army to manage the work. The Army Corps of Engineers is to complete the work.

May — The Corps utilizes a consulting firm, Woodward-Clyde Consultants, to conduct a subsurface confirmation study.

The Corps establishes a projected time schedule:

Remove surface contaminants	July 1985
Complete confirmation study	September 1985
Begin subsurface cleanup	August 1986

A steering committee is formed with representatives from the Army, GSA, and the Corps of Engineers, according to the Corps project manager. He said the committee's purposes are to keep the various agencies informed of activities, identify problems, and provide quick solutions.

July 12 — The removal of all known contamination in surface containers from the excess land is completed.

October 22 — Woodward-Clyde Consultants issues the final confirmation study for identifying the existence of subsurface contamination of the excess area by analyzing the soil and groundwater.

The study concludes that subsurface contamination has been detected from petroleum hydrocarbons, solvents, and, to a much lesser extent, heavy metals and trace amounts of pesticides.

The study recommends that the landfill and two other areas receive remediation and further monitoring. In addition, all identified subsurface storage tanks should be removed and the surrounding backfill material sampled. The potential for explosion should be monitored because many of the contaminants are highly volatile.

The study also states that it should be expected that undocumented and currently unknown auxiliary fuel storage tanks will be encountered at numerous locations. Three additional subsurface tanks were identified after the completion of field work.

LOW LEVEL RADIOACTIVE WASTE

1963 — Radioactive waste burial ceases at Hamilton.

Sometime later, the Air Force conducts a survey to identify bases where radioactive waste burials took place.

1971 — Hamilton personnel determine that there is an on-base radioactive waste burial site, but they do not know what was buried. They believe a corrugated steel pipe was inserted into the ground and waste was dropped into the pipe.

1974 — Air Force issues a letter stating that 46 bases (including Hamilton) have been identified as having radioactive waste burial

sites. The wastes are believed to be from electron tubes containing radionuclides, radioluminescent materials containing radium, and/or low level radioactive waste from nuclear weapons maintenance. The letter states that if property is to be excessed, a permanent easement should be obtained or efforts for disinterment should be made.

Air Force personnel at Hamilton indicate that they are unable to locate the burial area.

December 10 — A statement of contamination for radioactive waste is included in the Declaration of Excess prepared at the base for the excess property.

December 19 — A Report of Excess is filed with GSA. Although required, it contains no statement of contamination for radioactive waste.

1976 — A Navy geophysicist interviews, searches, and digs but cannot locate the pipe. He interviews a former maintenance superintendent who states that he was the one who, in about 1964 or 1965, capped off the pipe by digging down several feet, cutting off the pipe, and filling it with concrete.

The geophysicist reports that, if this were the case, the weight of the concrete would cause the pipe to sink. He believes that the "...device is sinking into the bay mud and may now be too deep to find or to recover at any reasonable cost." (Hamilton is situated on reclaimed mud flats where the mud may vary in depth to 60 feet.)

The geophysicist recommends that the entire matter be dropped because:

--the situation is not dangerous,
--excavation in this area is unlikely,
--if such an excavation were conducted and if the device were later discovered, it could be removed safely, and
--if excavation takes place nearby, the bay mud and building materials will act as an adequate shield from the radiation.

	The Air Force, with concurrence of the Air Force Surgeon General, determines that the device should be "abandoned in place," the contamination notice should be removed from the Declaration of Excess, and the site should be struck from the master file.
1981	The base manager provides the geophysicist's reports to DOHS officials who review them and state that their concerns are alleviated because the waste is of such a type that it does not pose a problem.

GAO OBSERVATIONS

Toxic and hazardous waste cleanup efforts have been expedited since responsibilities were established in mid-April 1985. The Army has given a high priority to the cleanup efforts it is carrying out on the excess land. A steering committee was organized and meets periodically to solve problems as they arise. Within 3 months after the cleanup work began on May 1, 1985, the toxic chemicals, debris, and two transformers leaking PCBs were removed to a staging area on Army land. The Army project manager told us that the waste was completely disposed of on November 19, 1985. Concurrently with the surface cleanup work, a confirmation study was begun to test for subsurface contamination.

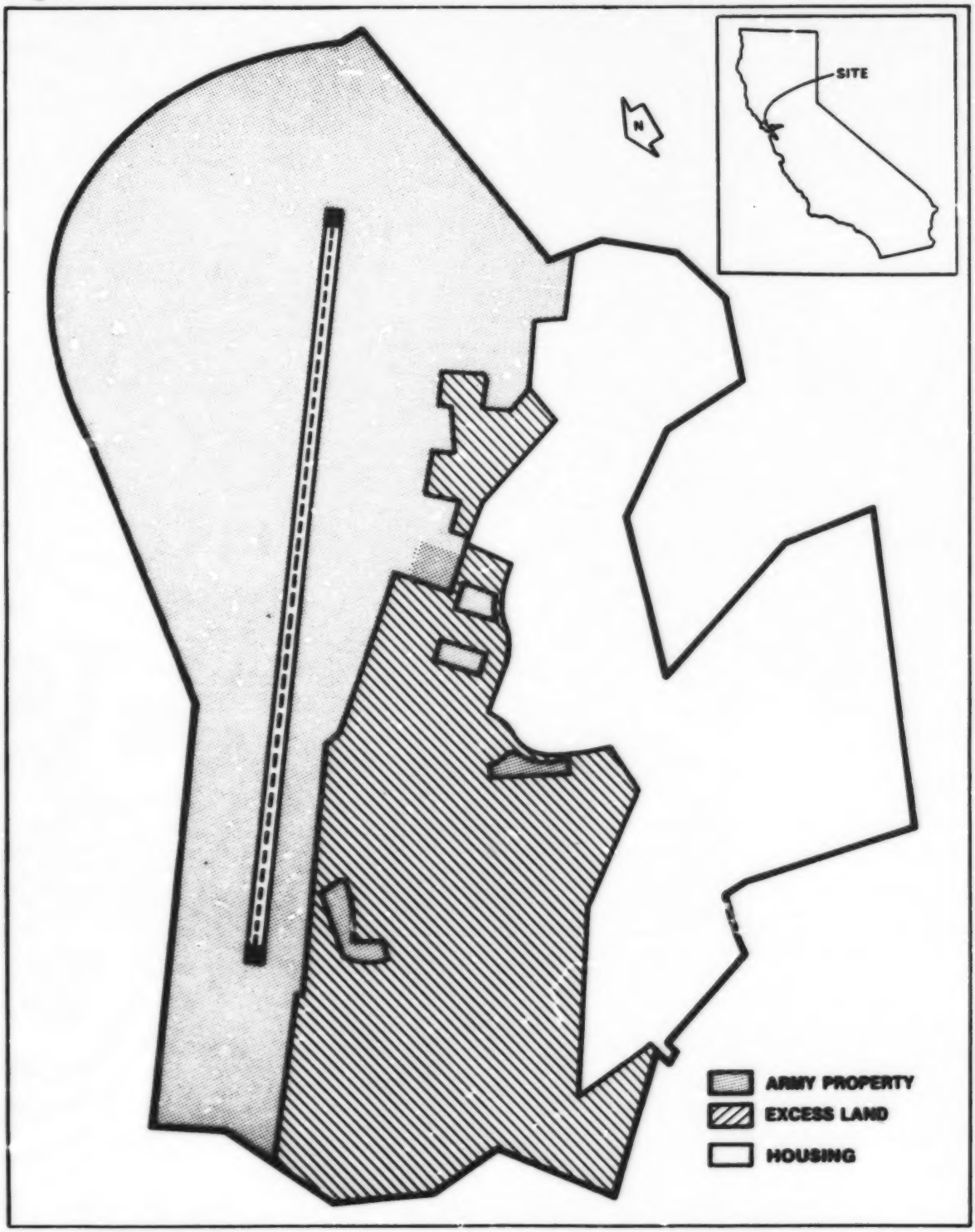
However, questions still remain. Although the waste from the former radioactive waste disposal repository is reportedly located outside the excess area on Army-retained property, Hamilton authorities do not know its exact location and contents. Also, the Air Force has yet to provide records on the condition of the land or its past uses. It identified the location of the records after the confirmation testing was finished. The current cleanup effort has had to proceed without information on the Air Force's past use of toxic and hazardous materials, known or suspected areas of contamination, or decontamination efforts.

The Army overlooked early warning signs of contamination. Prior to the auction of the excess land, the Army identified toxic and hazardous waste problems. Yet, the Army did not formally request GSA to delay the sale. On four occasions during 1984, toxic and hazardous wastes were identified at Hamilton. The Army did not respond to all of the events with cleanups and did not consider that such signals might be an indication of additional toxic and hazardous waste problems.

In preparing for and conducting the sale of the excess property at Hamilton, GSA did not comply with two of its toxic

and hazardous waste regulations. GSA regulations require a statement from the holding agency that the property being sold is in compliance with PCB regulations. GSA was late in its request of this statement from the Army and the statement was not obtained from the holding agency prior to the auction. GSA also did not advise the prospective buyers of the potential hazards at the time of the auction despite the results of the Army survey indicating contamination. GSA maintained that the survey did not contain enough information indicating potential contamination to warrant this.

Figure 1: Former Hamilton Air Force Base, California



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